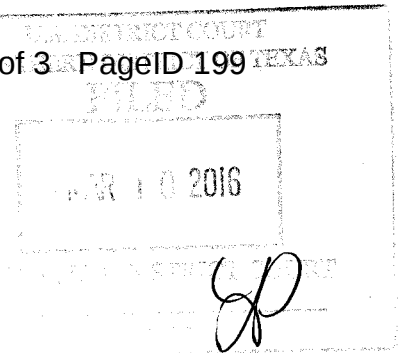


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

Criminal No. 3:16-MJ-077-BH

JOSE FLORES (02)
a/k/a/ "Gordo"

MOTION FOR DETENTION

The United States moves for detention of defendant, Jose Flores, also known as Gordo, pursuant to Crim. Rule 32.1(a)(6) and 18 U.S.C. §3143(a).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

_____ Crime of violence (18 U.S.C. §3156);

_____ Maximum sentence life imprisonment or death

XXX 10 + year drug offense

_____ Felony, with two prior convictions in above categories

XXX Serious risk defendant will flee

_____ Serious risk obstruction of justice

_____ Felony involving a minor victim

_____ Felony involving a firearm, destructive device, or any other
dangerous weapon

_____ Felony involving a failure to register (18 U.S.C. § 2250)

_____ Petition for Supervised Release Revocation was filed

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☐ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

☒ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

☐ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

☐ Probable cause to believe Defendant violated terms of supervised release, FRCP 32.1(a)(6).

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

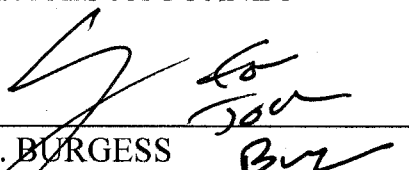
☐ At first appearance

☒ After continuance of 3 day (not more than 3).

DATED this 10th day of March, 2016.

Respectfully submitted,

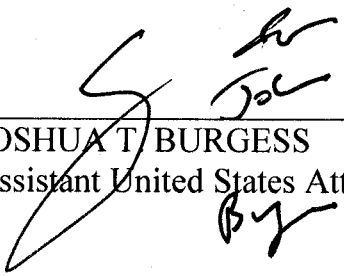
JOHN R. PARKER
UNITED STATES ATTORNEY



JOSHUA T. BURGESS
Assistant United States Attorney
State Bar No. 24001809
Burnett Plaza, Suite 1700
801 Cherry Street, Unit #4
Fort Worth, Texas 76102
Telephone: 817-252-5200
Facsimile: 817-252-5455

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on this 10th day of March, 2016.



JOSHUA T. BURGESS
Assistant United States Attorney